

The application is **GRANTED**. By **June 11, 2021**, Defendants shall publicly refile the Declaration of Paul H. Galligan with redactions.

In addition, Defendants' motion to seal states that there are several categories of information Defendants "seek to redact in this case." Dkt. No. 54. However, there are not any proposed highlighted redactions in the Declaration of Paul H. Galligan that is temporarily filed under seal at Docket No. 56. Accordingly, by **June 11, 2021**, Defendants shall file under temporary seal, a version of the Declaration of Paul H. Galligan including highlighting of proposed redactions, pursuant to Individual Rule I.D.3.

June 9, 2021

## **VIA ECF**

The Honorable Lorna Schofield United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

The Honorable Lorna Schofield The Clerk of Court is respectfully directed to strike Docket Nos. 56 United States District Judge and 58.

Dated: June 10, 2021 New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Bautista v. Chanel, Inc., et al., S.D.N.Y. Case No. 1:20-cv-04676-LGS

Dear Judge Schofield:

Our Firm represents Defendants Chanel, Inc. and Julie Papaioannou (collectively, "Defendants") in the above-referenced matter. We are writing to request that the Court strike ECF No. 58 (Declaration of P. Galligan in support of Defendants' Motion for Summary Judgment) because our office mistakenly included confidential documents in the filing.

By way of background, yesterday evening, Defendants filed a letter motion seeking to file under seal various exhibits to protect, among other things, confidential and proprietary business information when filing their Motion for Summary Judgment. (ECF Doc. No. 54.)

Later in the evening, Defendants filed their Motion for Summary Judgment. (ECF Doc. Nos. 57-60.) However, our office mistakenly filed the confidential exhibits in public view. (ECF Doc. No. 58.)

Accordingly, Defendants respectfully request that the Court strike ECF No. 58, which contains the confidential exhibits, and grant leave to Defendants to refile the declaration and exhibits as appropriate, pending the Court's decision on Defendants' Motion to Seal.

We thank the Court for its consideration of this request.



The Honorable Lorna Schofield June 9, 2021 Page 2

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Paul H. Galligan

Paul H. Galligan Mary Ahrens Vadasz Daniel I. Small

cc: All counsel of record (via ECF)